

### REMARKS

In the Office Action mailed on November 15, 2007, the Office took the following action: (1) rejected claims 1-5, 15, and 18-19 under 35 U.S.C. §102(e) as being anticipated by Brady Jr. et al. (U.S. Patent No. 7,114,171 B2 'Brady'); (2) rejected claims 6-9, and 17 under 35 U.S.C. §103(a) as being unpatentable over Brady in view of DeLorme et al. (U.S. Patent No. 6,321,158 B1 'DeLorme'); (3) rejected claims 10-11 under 35 U.S.C. §103(a) as being unpatentable over Brady in view of Eichmann (U.S. Patent No. 6,947,071 B2 'Eichmann'); (4) rejected claims 12-13 under 35 U.S.C. §103(a) as being unpatentable over Brady in view of Weinberger et al. (U.S. Patent No. 6,813,777 B1 'Weinberger'); (5) rejected claim 14 under 35 U.S.C. §103(a) as being unpatentable over Brady in view of Dittmann et al. (U.S. Patent No. 5,239,376 A 'Dittmann'); and (6) rejected claim 16 under 35 U.S.C. §103(a) as being unpatentable over Brady in view of Rivera (U.S. Patent Publication No. 2002 / 0124260 A1 'Rivera').

#### *Rejections under 35 U.S.C. §102(e)*

Claims 1-5, 15, and 18-19 were rejected under 35 U.S.C. §102(e) as being anticipated by Brady. Applicant respectfully traverses.

#### Claim 1

Claim 1 is rejected under 35 U.S.C. §102(e) as being anticipated by Brady.

As amended, claim 1 recites:

A vehicle seat for supporting a passenger of a vehicle,  
said seat comprising:

a seat frame having a mount for mounting the frame to the vehicle, a support extending from the mount, a seat bottom mounted on the support for supporting the passenger when occupying the seat, and a seat back extending upward from the seat bottom, said

seat back having a front surface oriented to face the passenger occupying the seat and a rear surface opposite said front surface;  
a video monitor mounted on the seat frame; and  
a digital processor operatively connected to the video monitor for processing a digital input for display as an image on the video monitor, the digital processor configured to organize and edit any one or more images from the digital input.

Claim 1 has been amended to include, in part, the limitations of previous dependent claim 6. Applicants respectfully submit that Brady fails to disclose each element of claim 1 as required under 35 U.S.C. §102(e). Specifically, Brady fails to disclose “the digital processor configured to *organize and edit any one or more images from the digital input*” as recited in claim 1. (Emphasis Added). Brady generally pertains to a method for controlling an in-flight entertainment system. (Abstract). The Office recites with reference to formerly presented dependent claim 6: “Brady does not teach said digital processor is configured to organize and edit a plurality [of] images selected from the digital input”. (Office Action, page 6, lines 6-7).

The Office relies on Brady in view of DeLorme in rejection of previous claim 6. The Office recites: “DeLorme discloses software configured to organize and edit a plurality [of] images selected from the digital input” (column 71 lines 36-44). However, DeLorme fails to remedy the above-noted deficiencies of Brady.

DeLorme generally pertains to an Integrated Routing/Mapping Information System (IRMIS) enabled to “construct a user customized multimedia travelog . . . of the user-defined travel route” (Column 1, lines 42-44). Specifically, the system “stores, manages and retrieves a database of multimedia information in relation to specific places” (Column 9, lines 44-45). The user can input or edit this multimedia information “[r]elative to specific geographic locations”. (Column 71, lines 36-44). Thus, in DeLorme, the digital processor is configured to organize and edit only the digital image

that relate to the particular location and not “any one or more images from the digital input” as recited in claim 1.

Therefore, Applicants respectfully request reconsideration and withdrawal of the rejection to claim 1.

**Claims 2-5, and 15**

Claims 2-5, and 15 depend from claim 1 and are thus believed allowable at least for their dependency on the allowable base claim 1. Further, the additional limitations in claims 2-5, and 15 provide limitations which are not taught by the cited reference. Therefore, Applicants respectfully request reconsideration and withdrawal of the rejection to claims 2-5, and 15.

**Claim 18**

As amended, Claim 18 recites in part:

A vehicle for transporting a plurality of passengers, said vehicle comprising: . . .

a digital processor operatively connected to the video monitor for processing a digital input for display as an image on the video monitor, the digital processor configured to organize and edit any one or more images from the digital input.

Applicants respectfully submit that Brady fails to disclose each element of claim 18 as required under 35 U.S.C. §102(e). Applicants incorporate the reasoning presented above in response to the rejection of claim 1. Specifically, Brady fails to disclose “the digital processor configured to *organize and edit any one or more images from the digital input*” as recited in claim 1. (Emphasis Added).

Therefore, Applicants respectfully request reconsideration and withdrawal of the rejection to claim 18.

### **Claim 19**

Claim 19 depends from independent claim 18 and is thus believed allowable at least for its dependency on the allowable base claim 18. Further, the additional limitations in claim 19 provide limitations which are not taught by the cited reference. Therefore, Applicants respectfully request reconsideration and withdrawal of the rejection to claim 19.

### ***Rejections under 35 U.S.C. §103(a)***

The Office Action rejected claims 6-9, and 17 under 35 U.S.C. §103(a) as being unpatentable over Brady in view of DeLorme; rejected claims 10-11 under 35 U.S.C. §103(a) as being unpatentable over Brady in view of Eichmann; rejected claims 12-13 under 35 U.S.C. §103(a) as being unpatentable over Brady in view of Weinberger; rejected claim 14 under 35 U.S.C. §103(a) as being unpatentable over Brady in view of Dittmann; and rejected claim 16 under 35 U.S.C. §103(a) as being unpatentable over Brady in view of Rivera. Applicants respectfully traverse.

### **Claims 6-14, and 16-17**

Claims 6-14, and 16-17 are rejected under 35 U.S.C. §103(a) as being unpatentable over Brady in combination with the above cited art. Brady, either singly or in combination (assuming arguendo that such combination is proper) fails to teach or suggest the recitations of claims 6-14, and 16-17.

Claims 6-14, and 16-17 depend from independent claim 1 and are thus believed allowable at least for their dependency on the allowable base claim. Further reasons are set forth below to highlight other limitations included in this dependent claim which establish allowable subject matter.

Claim 6 recites: “A vehicle seat in accordance with Claim 1 wherein said digital processor is further configured to *generate a digital travel log from the one or more images*”. The Office relies on Brady in view of DeLorme in rejection of this claim. The Office recites: “DeLorme further teaches said processor is configured to generate a digital travel album from said plurality of images (column 71 lines 36-44)”. (Office Action Page 6, lines 15-18). Applicants respectfully traverse.

DeLorme discloses “[r]elative to specific geographic locations, personal snapshots or video . . . can be input, stored and recalled, utilizing the present invention as a digital travel album.” (Column 71, lines 36-40). The personal snapshots or video of DeLorme are images that relate to specific geographic locations. Thus for a specific geographic location, only the related images can be used to generate the travel log which is not the equivalent of generating a digital travel log from “one or more images” since the “one or more images” is “any one or more images from the digital input” as recited in claim 6 including the recitations from the independent claim.

Claim 8 recites: “A vehicle seat in accordance with Claim 7 wherein said digital images recorded from the digital camera include *images captured from a digital camera mounted on the outer surface of an in-flight aircraft*.” The Office relies on Brady in view of DeLorme in rejection of this claim. Applicants respectfully traverse.

DeLorme teaches a system that inputs multimedia information relative to specific geographic locations. These specific geographic locations are “particular locations on or near the surface of the earth” (Column 6, lines 25-28). Thus the multimedia information of DeLorme must relate to locations on or near the surface of the earth and cannot relate to locations “*of an in-flight aircraft*” as recited in Claim 8.

Claim 9 recites: “A vehicle seat in accordance with Claim 6 wherein said processor is further configured to merge the one or more images into one digital image.” A thorough search of DeLorme fails to uncover any usage of the term “merge” or “combine” that teaches the recitations of Applicants' claim 9. As follows, two instances where DeLorme uses these terms are analyzed to show contrasting meaning in the context of DeLorme's description as compared to the recitations of claim 9.

The only discussion in DeLorme that may relate to *merging* is disclosed at Column 70, lines 55-57 as follows: “interactive and articulated options and structures for multimedia output that are organized so that the user can play, review, select, edit or merge location information in diverse media”. Merging location information as used in DeLorme is not the equivalent of “to merge the one or more images into one digital image” as recited in claim 9.

Specifically, the multimedia information of DeLorme is separate and distinct from the location information and thus to merge the location information is not the equivalent of “to merge the one or more images”. In Column 57 at lines 20-24, DeLorme makes the distinction between the digital images and the location information: “the invention stores, manages and retrieves a database of multimedia information in relation to specific places on or near the surface of the earth, referred to herein as points of interest (POIs), or geographical sites or locations. These are geographically locatable objects (loc/objects) for which multimedia information is available in the IRMIS database.” (Column 9, lines 44-50).

This distinction between the digital images and the location information is further illustrated in figures 8A and 8B of DeLorme. At step 804, the POI (or location) is retrieved and then at step 814, the available images (digital images) are displayed. By

separating the step of retrieving the location from the step of displaying the digital image, DeLorme illustrates that the images are stored independent from the "location" and are only retrieved when the user selects the particular location to which that image relates. Thus when DeLorme discloses merging locations, DeLorme discloses merging objects that do not include the digital images. Consequently, DeLorme fails to teach or fairly suggest a "processor . . . configured to merge the one or more images" as recited in claim 9.

The only discussion in DeLorme that may relate to *combining* is disclosed at Column 31, lines 31-33 as follows: "the user can elect to repeat or skip parts of a multimedia presentation, pick among or combine forms of media such as audio, text or graphics". Combining forms of media is not the equivalent of "merge the one or more images" which relates to merging one or more objects which are of the same form. DeLorme further discusses combining routing and multimedia elements (see for example Column 10, lines 40-43); however, as discussed above with respect to the use of merge, DeLorme teaches storing and retrieving the digital images in reference to a particular geographical location and thus does not teach or fairly suggest "to merge the one or more images into one digital image" as recited in claim 9.

Claim 17 recites: "A vehicle seat in accordance with Claim 1 wherein the said processor is operatively connectable to a transmitter for sending information output by the processor to *a location remote from the vehicle.*" (Emphasis added) The Office relies on Brady in view of DeLorme in rejection of this claim. The Office states "DeLorme further teaches the said processor is operatively connectable to a transmitter for sending information output by the processor to a location remove from the vehicle (column 7 lines 13-21)" Applicants respectfully traverse.

After a thorough review, Applicants respectfully submit that column 7 lines 13-21 fails to teach "a transmitter for sending information output by the processor to a location remote from the vehicle" as recited in claim 17. The only discussion in DeLorme that may relate to "a transmitter for sending information output by the processor to a location remote from the vehicle" is disclosed at Column 43, lines 7-10 as follows: "the IRMIS PDA might be programmed to automatically transfer any and all new digital photos". However, in order to transfer the digital photos in DeLorme, it is necessary that the PDA be "docked in its cradle or connected to the home-base desktop". (Column 13 line 64 - Column 14 line 1). This is not the equivalent of "sending information . . . to a location remote from the vehicle" which allows for data transfer without being connected to the home-base desktop.

Therefore, Applicants respectfully request reconsideration and withdrawal of the rejection to claims 6-14, and 16-17.

***Newly added claim 20***

Newly added claim 20 depends from independent claim 18 and is thus believed allowable at least for its dependency on the allowable base claim 18. Further, the additional limitations in claim 20 provide limitations which are not taught by the cited reference. In particular, applicants incorporate the reasoning presented above in response to the rejection of claim 9 under 35 U.S.C. §103(a) as being unpatentable over Brady in view of DeLorme. Specifically, DeLorme does not teach or fairly suggest "to merge the one or more images into one digital image".

Therefore, Applicants respectfully request favorable consideration of newly added claim 20.




**CONCLUSION**

For the foregoing reasons, Applicants respectfully submit that pending claims 1-20 are now in condition for allowance. If there are any remaining matters that may be handled by telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number listed below.

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Respectfully Submitted,

By:   
Damion J. Kruger  
Lee & Hayes, PLLC  
Reg. No. 60,400  
(206) 315-7918